

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS	:	
716 North Barrett Lane	:	
Christiana, DE 19702	:	DISTRICT COURT
PLAINTIFF	:	
	:	
v.	:	No. 04-251 JJF
	:	
JO ELLEN CHAPEN SHELDON	:	
708 Pebble Beach Drive	:	
Elkton, MD 21921	:	
DEFENDANT	:	

**DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION
TO COMPEL DISCOVERY**

COMES NOW, Beth H. Christman and Casarino, Christman & Shalk, P.A., to provide this Honorable Court with the response of the defendant to plaintiff's motion to compel discovery, production of documents and answers to interrogatories as follows.

1. Plaintiff served interrogatories and a request for production of documents on the defendant on December 4, 2006. Following a Motion for a Protective Order as to that discovery, the Court granted the Protective Order as to the interrogatories propounded by plaintiff but denied the Protective Order as to the request for production. The plaintiff then served a new set of interrogatories on the defendant on July 18, 2007.

2. On June 10, 2005, the defendant provided Rule 26(a) Initial Disclosures to the plaintiff at which time she was represented by Charles Cooper, Esq. On January 3, 2007, the

defendant's counsel sent plaintiff copies of all of the Rule 26(a) disclosure documents as well as copies of all medical records in the possession of defendant's counsel. Exhibit A.

3. On July 26, 2007, defendant provided a response to plaintiff's request for production of documents. While objections were provided in response to the request, all documents that were not objectionable were provided to the plaintiff.

4. On August 27, 2007, defendant provided responses to plaintiff's interrogatories. Thus, all discovery has been answered by the defendant.

WHEREFORE, Defendant, JoEllen Sheldon, asks this Honorable Court to Deny Plaintiff's Motion to Compel answers to interrogatories and request for production as defendant has already provided the plaintiff with responsive answers.

/S/Beth H. Christman
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